

commencement of the FLSA Notice Period. Plaintiffs' counsel shall file the consent forms with this Court with identifying information redacted as soon as practicable.

5. Defendant shall post the FLSA Notice Form attached to parties' Joint FLSA Notice Plan as Ex. B on the cafeteria bulletin board during the FLSA Notice Period.

6. If any putative FLSA opt-in class members seek relief from the FLSA's limitations period, Plaintiffs shall file a motion for equitable tolling within 45 days after the close of the FLSA Notice Period.

7. If experts are retained for the purposes of providing testimony for briefing related to Plaintiffs' motion for class certification under Rule 23:

- a. Plaintiffs shall designate such experts within 60 days after the close of the FLSA Notice Period, and Defendants shall designate such parties within 74 days after the close of the FLSA Notice Period.
- b. All parties shall file all designations of rebuttal experts and serve on all parties the material required by Federal Rule of Civil Procedure 26(a)(2)(B) for such rebuttal experts, to the extent not already served, 15 days from the receipt of the report of the opposing expert.

8. Plaintiffs shall file a motion for class certification under Rule 23 within 195 days after the close of the FLSA Notice Period.

9. All fact discovery shall be completed within 150 days after a decision on Rule 23 class certification is rendered.

10. If a class is certified under Rule 23(b)(3), the parties shall, within 14 days after the certification decision is rendered, submit a proposed plan for directing to class members the best

notice that is practicable under the circumstances. If, after conferring, the parties are unable to submit a joint plan, each shall file its own proposed plan.

11. If testifying experts are retained for trial:

- a. Plaintiffs shall designate such experts within 60 days after a decision on Rule 23 class certification is rendered, and Defendant shall designate such experts within 74 days after a decision on Rule 23 class certification is rendered.
- b. All parties shall file all designations of rebuttal experts and serve on all parties the material required by Federal Rule of Civil Procedure 26(a)(2)(B) for such rebuttal experts, to the extent not already served, 15 days from the receipt of the report of the opposing expert.

12. All dispositive motions shall be filed no later than 45 days after the close of discovery and shall be limited to 20 pages. Responses shall be filed and served on all other parties not later than 14 days after the service of the motion and shall be limited to 20 pages. Any replies shall be filed and served on all other parties not later than 7 days after the service of the response and shall be limited to 10 pages, but the Court need not wait for the reply before ruling on the motion.

13. This case is to be set for a trial at a time and date to be determined by the Court.

SIGNED on this ____ day of _____, 2021.

ROBERT PITMAN
UNITED STATES DISTRICT JUDGE